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REMARKS

Claim Rejections – 35 USC § 103

Claims 32-62 were rejected under 35 U.S.C. §103(a) as being obvious over the prior art.

Claims 32-46 and 51-62 were alleged to be obvious over a combination of Baumgarten, Lietz and Reynolds.

Regarding claim 37, Applicant points out that none of the prior art documents actually shows multiple layers of threads applied to the tubing. Reynolds merely mentions that a second layer can be applied which may use fibers of different materials. It does not mention that the bobbin creel units are coupled to each other or interacting with each other in any way. Lietz does not have a bobbin creel at all, and Baumgarten only briefly mentions a single thread reinforcing machine 7.

What the three prior-art documents teach is that the process of applying a rubber layer and a reinforcing thread layer can be duplicated, nothing else. Duplication, however does not include coupling the multiple units or establishing a one-way dependence between the units if there are no multiple units in the original. Duplication according to the prior art will only make the speed of the second bobbin creel unit dependent on the advancement speed again, just like the first bobbing creel unit.

Claim 32 has been amended to include the limitation from claim 37 that at least one further bobbin creel unit is provided whose rotational speed depends on the speed of the first bobbin creel unit.

Also, claim 37 has been rewritten in independent form and amended to remove the alternate language referring to the second boobing creel speed depending on the advancement speed. Unnecessary limitations regarding the thickness of the rubber layers have been removed. Now the claim is limited to methods where the speed of rotation of the second (or further) bobbin creel unit(s) depends on the speed of the firs bobbin creel unit.

Regarding claim 45, Applicant disagrees that Lietz suggests measuring the diameter of the mandrel. In fact, none of the references mentions measuring the thickness of the mandrels during the manufacturing process. The portion of the Lietz specification

allegedly suggesting measuring the mandrel diameter is the description of Fig. 3. This passage, however, only refers to a single measuring unit (see Fig. 3) with several options of measuring the outer diameter of the tube 16, not of the mandrel 22. Lietz expressly mentions that alternative techniques using methods other than a light source and a photo sensor must be accurate enough to measure the *outer diameter of the tube 16* with sufficient accuracy (Col. 3, lines 45-47).

Baumgarten does not measure any thickness at all, and Reynolds does not even have mandrels.

It is thus believed that the limitations of claim 45 are not obvious over the prior art. Claim 45 has been amended to become an independent claim, only including the limitations of previous claim 32.

Claim 59 is believed to be non-obvious for the same reasons as given for claim 45. Since none of the references mention a measurement of the mandrel diameter, claim 59 cannot be obvious over the prior art cited. Accordingly, claim 51 has been amended to include the limitations of claim 59 and is thus believed to be patentable.

All other claims not mentioned above directly or indirectly depend on the above claims and are thus believed to be patentable as well.

CONCLUSION

The claims as amended are believed to be allowable over the prior art presented. Thus allowance of the patent application is respectfully requested.

Respectfully submitted,

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